

UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA
Criminal No. 22-40 (JRT/LIB)

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1)HARSHKUMAR RAMANLAL PATEL

a/k/a “Dirty Harry,”

a/k/a Harry Patel,

a/k/a Param Singh,

a/k/a Haresh Rameshlal Patel,

a/k/a Harshkumar Singh Patel, and

(2)STEVE ANTHONY SHAND,

GOVERNMENT’S
SUPPLEMENT TO
ITS MOTION IN LIMINE
UNDER FED. R. EVID.
404(b) (ECF 125)

Defendants.

The United States of America, through its attorneys, Andrew M. Luger, United States Attorney for the District of Minnesota, Assistant United States Attorney Michael P. McBride and Trial Attorney Ryan Lipes, respectfully submits this supplement to its Motion in Limine to Admit Evidence Pursuant to Fed. R. Evid. 404(b) (ECF 125).

On November 6, 2024, the Grand Jury returned the Second Superseding Indictment in this case. (ECF 156). The charges now allege conspiracies spanning the period from on or about December 7, 2021, through January 19, 2022. *Id.* Consequently, evidence of the extent of the conspiracy during that

period raised in the government's Fed. R. Evid. 404(b) motion is clearly intrinsic and that portion of the motion is now moot.

Regarding Mr. Patel's Maryland license, upon further consideration, the government will not introduce evidence the license was fake. Rather it will merely introduce the license, which links Patel to the name "Haresh Patel" and to an address that he used in other documents relevant to the case. Consequently, it is intrinsic evidence and not evidence of an "other act" that would fall under Fed. R. Evid. 404(b).

Dated: November 13, 2024

Respectfully submitted,

ANDREW M. LUGER
United States Attorney

By: /s/ Michael P. McBride
Michael P. McBride
Assistant United States Attorney
MN Bar No. 0397292

Ryan Lipes
Trial Attorney
U.S. Department of Justice
N.Y. Bar No. 5404843
(202) 514-4715
Ryan.Lipes@usdoj.gov